

**United States Bankruptcy Court  
Middle District of Pennsylvania**

In re:

Craig Zimmerman,  
Meredith Ann Zimmerman,  
  
Debtors.

Case No. 23-00456-HWV

Chapter 13

Related to ECF No. 40

**Debtor's Objection to Motion for Relief from Stay filed by Santander Bank  
N.A.**

**AND NOW**, Debtors Craig Zimmerman and Meredith Ann Zimmerman, by and through their attorney, hereby objects to the Motion for Relief from Stay filed by Santander Bank N.A. The Debtors contend that all post-petition payments were timely made and that the arrearage described in the motion is erroneous.

**NOW, THEREFORE**, the Debtor asks this Court to deny the Motion in the form of order attached and to grant such other and further relief in their favor as may be necessary and proper under the law.

Date: March 17, 2024

CIBIK LAW, P.C.  
*Counsel for Debtor*

By: /s/ Michael A. Cibik  
Michael A. Cibik (#23110)  
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Philadelphia, PA 19102  
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**Certificate of Service**

I certify that on this date I caused a true and correct copy of the Debtor's Objection to Motion for Relief from Stay filed by Santander Bank N.A. to be served on all parties on the clerk's service list through the CM/ECF system.

Date: March 17, 2024

/s/ Michael A. Cibik  
Michael A. Cibik

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

In re:

Craig Zimmerman and Meredith Ann  
Zimmerman,

Debtor.

Case No. 23-00456-HWV

Chapter 13

Related to ECF No. 40

**Order Denying Motion for Relief from Stay filed by Santander Bank N.A.**

**AND NOW**, upon consideration of the Motion for Relief from Stay filed by Santander Bank N.A., and the Debtor's objection thereto, and after notice and hearing, it is hereby **ORDERED** that the Motion is **DENIED**.